

**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF CONTRA COSTA**

THE PEOPLE OF THE STATE OF CALIFORNIA,  
Plaintiff,

v.

WILLIAM JOHN CELLI,  
*dob 02/26/1960*;  
Defendant.

Docket: 02-321301-4  
DA No: 0130898719

COMPLAINT - FELONY

Count 1) PC422(a)  
Count 2) PC422.6(a)

**COUNT 1 – CRIMINAL THREATS**

The undersigned states, on information and belief, that William John Celli, Defendant, did commit a Felony, a violation of PC422(a), Criminal Threats, committed as follows:

On or about December 4, 2015, in the County of Contra Costa, State of California, the crime of Criminal Threats in violation of PC422(a), a Felony, was committed in that WILLIAM JOHN CELLI did willfully and unlawfully threaten to commit a crime which would result in death and great bodily injury to Housam Syouf, with the specific intent that the statement be taken as a threat. It is further alleged that the threatened crime, on its face and under the circumstances in which it was made, was so unequivocal, unconditional, immediate and specific as to convey to Housam Syouf a gravity of purpose and an immediate prospect of execution. It is further alleged that the said Housam Syouf was reasonably in sustained fear of his/her safety and the safety of his/her immediate family.

**ENHANCEMENT 1**

PC422.75(a): Special Allegation-Hate Crime

It is further alleged as to Count 1 that the defendant, WILLIAM JOHN CELLI committed the above offense in violation of Penal Code section 422.75(a).

**COUNT 2 – VIOLATION OF CIVIL RIGHTS**

The undersigned states, on information and belief, that William John Celli, Defendant, did commit a Misdemeanor, a violation of PC422.6(a), Violation Of Civil Rights, committed as follows:

On or about December 4, 2015, in the County of Contra Costa, State of California, the crime of Violation Of Civil Rights in violation of PC422.6(a), a Misdemeanor, was committed in that WILLIAM JOHN CELLI did unlawfully and by force and threat injure, intimidate, interfere with, oppress and threaten Housam Syouf and other mosque attendees in the free exercise and enjoyment of a right and privilege secured by the Constitution and laws of California and the Constitution and laws of the United States because of disability, gender, nationality, race and ethnicity, religion, sexual orientation, and association with a person and group with one and more of these characteristics and because the defendant perceived that the victim had said characteristics and perceived that the victim associated with a person and group with one and more of these characteristics.

Complainant requests that the Defendant[s] be dealt with according to the law.

Dated: December 23, 2015, at Richmond, California

MARK A. PETERSON  
District Attorney



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Derek Butts  
Deputy District Attorney